

EXHIBIT NO. 14

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

VIVIAN BERT, et al.,)	CASE NO. C-1-02-467
)	
Plaintiffs,)	Judge Sandra S. Beckwith
)	Magistrate Judge Timothy S. Hogan
)	
v.)	
)	
AK STEEL,)	
)	
Defendant.)	
<hr style="width: 45%; margin-left: 0;"/>		
County of Jefferson	:	
	:	
State of Alabama	:	

DECLARATION OF EDWIN L. BRADLEY, JR., PH.D.

I, Edwin L. Bradley, Jr., declare the following to be true and correct:

1. My name is Edwin L. Bradley, Jr. and I am over eighteen (18) years of age. I make this declaration under penalty of perjury, freely and voluntarily, under no coercion, threat, or intimidation, and without promise of benefit or reward, based on my own personal knowledge. If called to testify, I could and would testify consistent with the matters stated herein.

2. I am by training and experience a statistician and biostatistician. I am currently the principal in a consulting firm in Birmingham, Alabama, which operates as Quantitative Research Associates. I hold a Bachelor of Science degree (with honors) in Mathematics from the University of Florida (1964), a Master of Statistics from the University of Florida (1967), and a Ph.D. in Statistics from the University of Florida (1969).

3. I was a Professor of Biostatistics at the University of Alabama at Birmingham where I taught and conducted research for 28 years. I am currently a Professor Emeritus at the University. During my career as a professor of biostatistics, I taught courses in Statistical Analysis, Statistics in Biology, Design of Experiments, Probability, Inference and other areas of statistics.

4. I am a member of several professional societies, including the Biometrics Society and the American Statistical Association. I have authored more than 215 publications that have appeared in peer-reviewed scientific journals such as *American Statistician*, *Journal of the American Statistical Association*, *IMA Journal of Mathematics Applied in Business and Industry*, and *Technometrics*.

5. I have served as a consultant and applied statistical methodology in the fields of medical research, litigation and business applications for over 38 years. I have been accepted as a statistical expert, in both state and federal courts. Both plaintiffs and defendants have retained me.

6. I was asked by counsel for the plaintiffs to analyze the testing component of the hiring process for Laborer positions at the Middletown Works for the period from August 12, 2001 through December 31, 2003 and for the period from September 9, 2001 through December 31, 2003, using the Baker Middletown Data¹. The benchmark for the testing component is the percentage of African-American applicants who successfully passed AK Steel's internal screening of applicants in each period.

7. There were a total of 949 applicants who passed the test during the period from August 12, 2001 through December 31, 2003, of which 70 were African-American. If race were not a

¹ Electronic data file middletown data.xls utilized by defendant's expert Dr. Mary Baker covering the period January 1, 2000 through December 31, 2003.

factor in the selection process, 9.18% of the successful applicants, or approximately 87 individuals, would have been African-American. There were approximately 17, or 19.7%, fewer African-Americans who passed the test than expected during the period analyzed. This shortfall is statistically significant with -2.63 standard deviations of difference. The adverse impact ratio is 78.7%, which is less than the 80% allowed under the *Uniform Guidelines*.

8. There were a total of 898 applicants who passed the test during the period from September 9, 2001 through December 31, 2003, of which 63 were African-American. If race were not a factor in the selection process, 9.00% of the successful applicants, or approximately 81 individuals, would have been African-American. There were approximately 18, or 22.1%, fewer African-Americans who passed the test than expected during the period analyzed. This shortfall is statistically significant with -2.84 standard deviations of difference. The adverse impact ratio is 76.3%, which is less than the 80% allowed under the Uniform Guidelines.

9. I utilized the same statistical methodology that I employed in my *Rebuttal Expert Report Regarding Hiring into Laborer Positions at the Middletown Works and Ashland Works of AK Steel* dated July 6, 2005.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this, the 20th day of December 2005.


Edwin L. Bradley, Ph.D.